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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

\$755,831 in United States Currency,

Defendant,

Oliver Jair Martinez-Mendez

Claimant.

2:25-CV-310-APG-DJA

ORDER GRANTING

**Government's Motion to Extend the Time to Clarify the facts of Oliver Jair Martinez-Mendez's Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture Complaint, ECF No. 23, to Delay Motion for Entry of Default Judgment of Forfeiture, ECF No. 16, and Order.**

**(Third Request)**

The United States of America respectfully moves this Court for an Order extending the time for the government to respond to, and to clarify the facts and statements of, Oliver Jair Martinez-Mendez's Motion to Set Aside Clerk's Default and to Dismiss the Forfeiture Complaint (Motion), ECF No. 23, to and including February 9, 2026.<sup>1</sup> The current response deadline is November 11, 2025, and was continued from June 10, 2025, and August 11, 2025. This is the third request.

The government believes the clarification will cause Mendez to withdraw his Motion. The government also agrees, per Mendez's request, this Court delay entering the

<sup>1</sup> LR IA 6-1(a) and (c).

1 Motion for Entry of Default Judgment of Forfeiture, ECF No. 16, until after the resolution  
 2 of Mendez's motion. The government also reserves the right to file special interrogatories  
 3 for Martinez to show his "identity and relationship to the defendant property"<sup>2</sup> and  
 4 subsequent discovery.

5 The grounds for extending the time are as follows.

6 The government has been in process obtaining permission from the Court to provide  
 7 sealed documents on two related sealed cases. The one Court granted permission on one of  
 8 the related sealed cases, but the government waits on the Court for the other case. It is not  
 9 within the government's control to obtain the Court's permission to provide the documents.

10 Because the parties previously agreed, the government proposed Stipulations for  
 11 Protective Orders. The government believes the Stipulations are necessary to protect the  
 12 disclosure of sensitive, law-enforcement information in connection with any investigations.  
 13 Mendez's counsel, Richard Wynn and Ismail Amin, have refused to sign the Stipulations.

14 The government still hopes to obtain a protective order for the sealed cases. As soon  
 15 as the government receives permission on the other related case, it will provide the  
 16 documents to Mendez's counsel. The government hopes this time extension will also  
 17 provide Mendez sufficient time to review the documents and to withdraw his Motion.

18 Preveioulsy, Martinz's counsel communicated with undersigned that if he needed  
 19 additional time to request it. On November 5, 2025, undersigned requested an extension of  
 20 time from Mendez's counsel but did not received a response. This extension of time benefits  
 21 both parties and this Court.

22 This Motion is not submitted solely for the purpose of delay or for any other  
 23 improper purpose.

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27 <sup>2</sup> Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture  
 28 Actions advisory committee's note (subdivision (6)); *United States v. \$133,420.00 in U.S.*  
*Currency*, 672 F.3d 629, 635 (9th Cir. 2012) (citing advisory committee's note).

1 This Court should grant an extension of time to, and including, February 9, 2026, for  
2 (1) the government to respond to the Motion to Set Aside Clerk's Default and to Dismiss  
3 the Forfeiture Complaint, if Mendez does not withdraw his Motion, (2) for Mendez to  
4 respond to the Motion for Entry of Default Judgment of Forfeiture, and (3) the government  
5 to pursue special interrogatories.

6 Dated: November 5, 2025.

7 Respectfully submitted,

8 SIGAL CHATTAH  
Acting United States Attorney

9 /s/ Daniel D. Hollingsworth  
10 DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

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13 IT IS SO ORDERED:

14 Dated: November 6, 2025

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17 ANDREW P. GORDON  
18 CHIEF UNITED STATES DISTRICT COURT JUDGE  
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